RESPONSIVENESS SUMMARY FOR
Desert Sun Fiberglass
Permit Number V97-002
Significant Revision S05-018
April 4, 2006

DESERT SUN FIBERGLASS (DSF) COMMENTS:

Comment # 1:

The page number listed for Appendix A should be corrected from 27 to 43.

Response # 1:

Table of contents page number for Appendix A has been changed.

Comment # 2:

Specific Permit Condition 22.B.3) has several errors:

The referenced 40CFR§63.805 appears to be incorrect; it should be 40CFR§63.5805.

The "methods specified in permit conditions 22.B.3)a) through 22.B.3)b)" should be corrected to read "methods… 22.B.3)d)".

In 22.B.3)a) "Tables" should be corrected to "Table" for correct grammatical usage.

Response #2:

The regulatory authority that was cited, 40CFR§63.805, was an incorrect citation. The rule citation has been changed to 40CFR§63.5900 to reflect the more accurate regulatory authority. The reference referring to the specific methods for compliance have been changed to *"The Permittee shall demonstrate continuous compliance with each standard that applies to the facility using the following methods;"* to encompass all the requirements for continuous compliance. The grammatical error concerning the word "Tables" has been changed to "Table".

Comment # 3:

Specific Condition 22.B.3)b) cites reporting requirements per 40CFR§63.5835(d). This section pertains to development and implementation of "*a written start-up, shutdown, and malfunction plan according to the provisions of §63.6(e)(3) for any organic HAP emission limits you meet using an add-on contro*l". **Desert Sun does not have any add-on control for HAP emissions, making this condition not applicable.** Should the reference be 40CFR§63.5895(d)?

Response # 3:

The regulatory authority that was cited, 40CFR§63.5835(d)5, was an incorrect citation. This citation does in fact refer to requirements for an add on control which is not an applicable requirement for DSF. The rule citation has been changed to 40CFR§63.5900 to reflect accurately the proper regulatory authority of the permit conditions.

Comment # 4:

E. Options for meeting Standards correctly cites 40CFR§63.5810 as providing the options for meeting the standards for open molding and centrifugal casting operations, but the County has opted to redefine Table 1 from Subpart

WWWW as Table 22.1; Table 3 from Subpart WWWW as Table 22.2; Table 4 of Subpart WWWW as Table 22.3; Table 7 of Subpart WWWW as Table 22.4. Please note the discussion later in these comments regarding errors and missing entries from these redefined Tables from those in the most current version of Subpart WWWW. **The Tables should be corrected to correctly reflect the current requirements of Subpart WWWW.**

Response #4:

The tables in the permit have been corrected to address the inconsistencies in regard to the tables in the final rules. The corrections include the addition of missing footnotes. However, standards in the tables in subpart WWW that are not applicable to current operations have not been included in the Tables of the permit.

Comment # 5:

Equation 22.1 appears to correspond to Equation (2) in 40CFR§63.5810; Equation 22.2 appears to correspond to Equation (3) in 40CFR§63.5810; and Equation 3 (Page 31) appears to correspond to Equation (4) in 40CFR§63.5810. Should Equation 3 be re-named Equation 22.3 in order to be consistent with the other designations? **The equations cited should include the correct rule reference.**

Response #5

The rule citations have been added to the 3 equations in the permit conditions. Equation 3 has also been re-named equation 22.3 to remain consistent with the previous 2 equations designations.

Comment # 6:

Table 22.1: Equations to Calculate Organic HAP Emission Factors for Specific Open Molding (and Centrifugal Casting Process Streams) corresponds to Table 1 from Subpart WWWW. Factors for centrifugal casting have been omitted from this table, and its title has been shortened to reflect this content reduction. **Table 22.1 should be revised to correspond with Table 1 of Subpart WWWW.**

Response #6:

Currently DSF does not manufacturer centrifugal casted products nor do they currently have equipment at the facility to be able to manufacture centrifugal casted products. In order for DSF to manufacturer this type of product, new equipment will need to be added to the facility which meets the MCAQD definition of a modification per County Rule 100 § 200.65. Therefore, a permit revision will be necessary in order to add centrifugal casting abilities to the facility. After approval of the permit revision would be the appropriate time to incorporate these types of changes, including the emission factors for centrifugal casting, into the permit. It is MCAQD's position that non applicable NESHAP requirements for Title V sources do not need to be included in the Title V permit.

Comment # 7:

Table 22.1 does not reflect changes made in the August 25, 2005 Direct Final Rule revisions to Subpart WWWW, and incorrectly lists Item "h." as "Manual gel coat application". This should be re-designated as "atomized spray gel coat application using robotic or automated spray". None of the footnotes from Table 1 from 40CFR§63 Subpart WWWW have been included with Table 22.1. The missing footnotes include significant contextual information that enables correct use of factors in the table. This comment was also provided in writing in Desert Sun's letter of January 9, 2006, but no action was taken by Maricopa County between that date and the January 24, 2006 public posting date. **Table 22.1 should be revised to correspond with Table 1 of Subpart WWWW, including footnotes.**

Response #7:

Manual gel coat application was removed from section "h" has been changed to reflect the final rule. The applicable footnotes have been added to table 22.1. The footnotes that are not applicable to DSF have not been added to Table 22.1.

Comment # 8:

Table 22.2: Organic HAP Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion and Continuous Lamination/Casting Operations corresponds to Table 3 from Subpart WWWW.

Written comments (again due to the August 25, 2005 Direct Final Rule changes) provided to Maricopa County in Desert Sun's letter of January 9, 2006, noted errors in this table but no action was taken by Maricopa County between that date and the January 24, 2006 public posting date. Those, still present, errors include:

1. Elimination of the right-hand column entirely;
2. Revision of three emission factors:
    a. 1a from 112 to 113
    b. 2a from 87 to 88, and
    c. 6a from 437 to 440

Not all of the footnotes from Table 3 from 40CFR§63 Subpart WWWW have been included with Table 22.2. The missing footnotes include significant contextual information that enables correct use of factors in the table. **Table 22.2 should be revised to correspond with Table 3 of Subpart WWWW, including footnotes.**

Response #8:

As requested, the right hand column has been eliminated completely from Table 22.2. The three incorrect emission limits have been updated to reflect the final rule. The applicable footnotes (1 and 2 from Table 3 of Subpart WWWW) have been added to Table 22.2. However, footnotes 4, 5 and 6 from Table 3 in subpart WWWW could not be added because centrifugal casting, pultrusion and continuous lamination are not applicable to DSF since this work is not performed at the facility nor is the equipment installed to be able to use these processes. In order to make the permit conditions more reflective of DSF operations, part 7, 8, 9 and ten have been removed from Table 22.2.

Comment # 9:

Table 22.3: Work Practice Standards corresponds to Table 4 from Subpart WWWW.

Footnote 1, relating to open containers of 5-gallons or less, for BMC operations, and containers with a surface area of 500 square inches or less for polymer casting operations has also been omitted. **Table 22.3 should be revised to correspond with Table 4 of Subpart WWWW, including footnotes.**

Response #9:

Please refer to Response #4.

Comment # 10:

Table 22.4: Options Allowing the Same Resin across Different Operations that use the same resin type, corresponds to Table 7 from Subpart WWWW. The entry in the seventh row from the top of the right-hand column, 38.4, should be deleted from the table. All footnotes from Table 7 of Subpart WWWW have been omitted from Table 22.4. **Table 22.4 should be revised to correspond with Table 7 of Subpart WWWW, including footnotes.**

Response #10:
Please refer to Response #4.

NOTE:
Comments 11 through 18 are only specific to Desert Sun Fiberglass and will not be included in other responsiveness summaries.

Comment # 11:

Appendix A. The designations of the Booths were provided by Desert Sun to Maricopa County as Booth #1, Booth #2,…, Booth #8. The designations as gel coat, chopper or grinding are not needed to identify these pieces of equipment because the subject booths are identified with numerical tags ranging from 1 to 8. No additional designation is required to correctly identify each Booth.

Please also see the information included later in this response regarding insignificant activities and equipment that may be performed or operated at the site. Per Rule 200 (08/22/01), "*Rather than supplying detailed information, a Title V source may, in its permit application, list and generally group insignificant activities, which are defined in Rule 100 (General Provisions and Definitions) of these rules and which are listed in Appendix D (List of Insignificant Activities) of these rules*". A list of insignificant activities that may be conducted by Desert Sun has been provided, with those activities generally grouped into seven categories, including raw materials receiving and storage, resin formulation and compounding, tooling and fixtures preparation, resin application, resin curing, trimming and finishing operations, and packaging for shipment and delivery.

Response #11:

40 CFR Section 70.5(c)(3) requires a permit application to describe all emissions of pollutants for which a source is major and all emissions of regulated air pollutants. It also authorizes the permitting authority to obtain additional information as needed to verify which requirements are applicable to the source. MCAQD has the authority to require a description of all process and control equipment for which permits are required including the name, make, model, serial number, date of manufacture, size/production capacity and type. DSF could not provide the make, model or serial number for any of the existing spray booths. Therefore, when developing the equipment list, MCAQD included detailed descriptions in order to establish that the permit accurately reflects the equipment on site and to ensure that DSF is complying with all applicable requirements. Without the detailed equipment list, MCAQD could not verify whether or not DSF has not made changes at the facility that would trigger a modification as defined in County Rule 100 § 200.65. Modifications can trigger new applicable requirements such as County Rule 240 or County Rule 241 requirements. In addition, without the detailed equipment list, the requirements of County Rule 210 § (405 & 406) would not be enforceable and compliance could not be determined. The equipment descriptions, such as gel coat, chopper or grinding, are considered to be the designation of the "type" of spray booth and a requirement of the equipment list.

Comment # 12:

TSD for January 24, 2006. The entire first paragraph of the January 24, 2006 addendum to the TSD appears to be a "cut and paste" boilerplate statement from the federal regulation, and implies that Desert Sun uses methylene chloride. Desert Sun does not, and does not anticipate any use of methylene chloride. **The references to methylene chloride give the false impression that this substance is used in the Desert Sun facility.** While the claimed nationwide reduction in HAP emissions as a result of implementation of the subject MACT standard appears to be significant, compliance with the requirements imposed on Desert Sun by Subpart WWWW involve nothing more than revised record-keeping and reporting requirements that do not result in any reduction in emissions of HAP materials.

Response #12:

The initial paragraph of the TSD discusses the requirements of subpart WWWW in a national perspective. The language is very similar to the language in the federal regulation. A footnote has been added to the statement about methylene chloride to address the fact that DSF does not, and does not anticipate any use of methylene chloride.

Comment # 13:

Desert Sun did not list woodworking equipment in the current (existing) permit, so the statement is the first sentence of this paragraph is incorrect. Furthermore, the verbal request by MCAQD to update the facility equipment list was not limited to woodworking equipment. Desert Sun provided MCAQD with a list of significant equipment that included a discussion where MCAQD instructed Desert Sun not to include spray guns in its list of significant equipment because MCAQD is in the process of finalizing its position on how to best regulate use and maintenance of spray guns.

The statement, "the general listing of woodworking equipment has been removed" is puzzling. No such list was ever included in this permit; therefore it could not have been removed.

The applicability or operation of the final sentence in the final paragraph on this page is unclear. It states, "*Desert Sun Fiberglass will be in violation of their permit if there is any equipment located at the facility that does not meet the requirements of trivial or insignificant per MC rules and regulations*". Establishing a permit condition within a Technical Support Document is not appropriate. **If MCAQD proposes to incorporate this provision as a permit condition, it should be written as a permit condition and the scope and intent of the provision needs to be clarified.**

The paragraph, as a whole, discusses woodworking equipment, so the applicability of the final sentence should be restricted to cover only woodworking equipment. However, the sentence does not explicitly provide that restriction, allowing the possibility of broader interpretation. The statement, "*Desert Sun Fiberglass will be in violation of their permit if there is any equipment located at the facility that does not meet the requirements of trivial or insignificant per MC rules and regulations*" could easily be construed to prevent Desert Sun from conducting any manufacturing activity that does not fall into either the trivial or insignificant category. Such a requirement would not be acceptable to Desert Sun and could not be the intent of MCAQD. Such a significant restriction on Desert Sun would be well beyond the scope and authority that initiated modification to this permit (inclusion of the MACT standards) and would be grounds to reexamine the conditions imposed by the permit and restart the modification process. **However, if this sentence is directed only at possible woodworking equipment that is not either trivial or insignificant, then it should be re-written to make that limited intent absolutely clear**.

Response #13:

After further investigation, MCAQD has realized that this statement was made in error and a general list of woodworking equipment was not located in the previous equipment list. The statement, "the general listing of woodworking equipment has been removed" has been removed from the technical support document (TSD).

The wording in the final TSD paragraph is confusing as the comment by DSF has pointed out. The paragraph has been changed to the following.

MCAQD has requested that the facility update the equipment list to include all woodworking equipment that did not meet the requirements to be deemed insignificant. Desert Sun Fiberglass responded to MCAQD that there is no woodworking equipment at the facility that would be required to be permitted and specified in the equipment list. Therefore, it has been established that Desert Sun Fiberglass does not have woodworking equipment on their site that is not specifically listed on the equipment list (other than insignificant equipment). In the event that equipment located at the facility is not listed on the equipment list and does not meet the requirements of trivial or insignificant per MC Rules and Regulations and permit condition 14.C, Desert Sun Fiberglass will be in violation of their permit. This paragraph is intended to clarify MCAQD's position to DSF concerning the equipment list. If a piece of equipment is at the facility that is not on the equipment list and does not meet the definition of a trivial or

insignificant activity per County Rule 100 §200.108 and 100 § 200.58, MCAQD will treat that piece of equipment as a new piece of equipment that will required to comply with the requirements concerning permits, permit changes, amendments and revisions as stated by permit condition 14.C.

Comment # 14:

Requests were made in the January 9, 2006 letter for the Control Officer to provide approved emission factors for closed mold and polymer casting processes. Specific Permit Condition 20.A.1 stipulates that the facility use "the most recent emission factors approved by the control officer". **The requested emission factors have not been provided. When can those responses be expected?** Suggested emission factor for closed molding operations is 1% of styrene weight (ACMA recommendation); the suggested emission factor for polymer casting operations is 2% of styrene weight (MCAQD 2004).

Response #14:

The emissions inventory division lists emission factors for open molding operations, including polymer casting, on MCAQD's website. The web address is http://www.maricopa.gov/aq/ei/docs/05resin.pdf . These emission factors are approved by the control officer.

Currently, DSF does not have the authority to perform closed molding operations at the facility. DSF has not performed these operations in the past nor do they currently have equipment onsite to perform these operations. A permit revision will be required in order for DSF to perform these operations. Emission factor approval will be included during the permit revision process if DSF chooses to do so. At the time of permit revision, MCAQD will require the appropriate information in order to make a determination concerning the emission factor.

Comment # 15:

Clarification was also requested in the January 9, 2006 letter about what specific analysis must be performed in order to determine when a piece of equipment must be included in the listing required by Item 11 of Appendix B, of "*a description of all process and control equipment for which permits are required*". Desert Sun believes that it is reasonable to list all control equipment and any process equipment that has emissions above those defined as "insignificant" per Rule 100.258. Per Section 308.1a of Rule 200, any equipment with "insignificant" emissions can be generally grouped. A listing of insignificant activities performed at the Desert Sun facility, along with typical equipment associated with those activities, has been included at the end of these Comments. **The requested clarification has not been provided. When will that response be provided?**

Response #15:

County Rule 100 § 200.85 defines an insignificant activity as *"For the purpose of this rule, an insignificant activity shall be any activity, process, or emissions unit that is not subject to a source-specific applicable requirement, that emits no more than 0.5 ton per year of hazardous air pollutants (HAPs) and no more than 2 tons per year of a regulated air pollutant, and that is either included in Appendix D (List of Insignificant Activities) of these rules or is approved as an insignificant activity under Rule 200 of these rules. Source-specific applicable requirements include requirements for which emissions unit-specific information is needed to determine applicability."*

MCAQD will consider an evaluation submitted by DSF for a specific piece of equipment, provided that all the specifications of the equipment are included and a calculation of the potential emissions is provided. In response to the January 9, 2006 letter, MCAQD verbally provided this information to Steve Styer, the technical representative of DSF. As a clarification, MCAQD would like to note that a source is responsible to develop the appropriate calculations and assessment to determine the potential emissions from all equipment on their site. MCAQD

provides guidance and input in specific situations if the source has provided sufficient information and specifications for the piece of equipment in question.. The groupings of equipment will be addressed below.

Comment # 16:

Request for Guidance was also made in the January 9, 2006 letter, specifically requesting MCAQD to answer the question: Do you agree that partial conversion to, or addition of closed molding operations at the facility is allowed without a permit modification? MCAQD replied verbally (not in writing) that if Desert Sun believes it has the authority to do closed molding without a permit modification, it would be free to proceed and the matter can be addressed through enforcement proceedings. Desert Sun finds this interpretation to be inadequate. It is Desert Sun opinion that closed molding is allowed under the current permit because closed molding was identified in Process ID #2 and Process ID #5 of the original permit application, and the NESHAP provisions include both closed molding and open molding processes. **Desert Sun requests that MCAQD clarify that closed molding is authorized under the permit or provide a justification based upon specific regulations as to why it is not authorized.**

Response #16:

Currently, DSF does perform closed molding operations at the facility. DSF has not performed these operations in the past nor do they currently have equipment onsite to perform these operations. In order to perform closed molding operations, DSF will need to modify existing equipment or purchase new equipment. This will meet the definition of a modification per County Rule 200 § 200.65. The term modification is defined by County Rule 100 § 200 which is, *"A physical change in or a change in the method of operation of a source which increases the actual emissions of any regulated air pollutant emitted by such source by more than any relevant deminimis amount, or which results in the emission of any regulated air pollutant not previously emitted by more than such deminimis amount"*. Without specific details about the equipment that would be incorporated by Desert Sun Fiberglass to perform closed molding, it is impossible for MCAQD to make a determination of the impact the changes would have on the facility. Without a clear assessment of the impact on the facility, MCAQD cannot determine the type of facility change that would be required to incorporate a new method of operation into the current facility. County Rule 200 § 301 details the type of changes that are prohibited without obtaining a permit revision from the Control Officer.

Comment # 17:

In that same letter of January 9, 2006 guidance was also requested regarding polymer casting. MCAQD response to this question was the same as that provided regarding closed molding. Polymer cast products are classified as related FRP products, as described in the Introduction of Desert Sun's original permit application submittal. **Desert Sun requests that MCAQD clarify that polymer casting is authorized under the permit or provide a justification based upon specific regulations as to why it is not authorized**.

Response #17:

DSF has performed a small amount of polymer casting operations at the facility since before the Title V was issued. The resin is mixed in small buckets and poured into prefabricated molds. Therefore, polymer casted products would not constitute a change in the method of operation or a physical change at the facility so long as new equipment is not added to the facility. Currently DSF mixes the resin and catalyst in a small plastic bucket by hand and poured into a custom mold. However, it should be noted that if new equipment is brought into the facility, DSF is required to determine if a modification is required and comply with all rules regarding facility changes.

Comment # 18:

Equipment List Issues. The equipment list included in the existing permit was developed by MCAQD from a more extensive submittal by Desert Sun. Equipment List content issues have been raised by MCAQD during this revision, even though the purpose of the revision is driven solely by the need to ensure compliance is maintained a new MACT Standard, Subpart WWWW. Desert Sun is providing the following equipment list content information as a gesture of good faith, even though the MACT Standard revision does not mandate this.

As stated earlier in the comment regarding Page 43 of the draft permit conditions, the following equipment is listed per Item 11 of Appendix B, Standard Permit Application and Filing Instructions Maricopa County, as revised February 15, 1995, to provide "*a description of all process and control equipment for which permits are required*". The list of significant equipment has been followed by a list and general grouping of insignificant activities and equipment, as stipulated in Section 308.1a of Rule 200 (08/22/01), which may be used or present at Desert Sun.

Name	Make (if available)	Model (if available)	Serial # (if available)	Date Mfg (if available)	Size or production capacity
Booth #1	NA	NA	NA	1979 (+/-)	10' by 10'
Booth #2	NA	NA	NA	1979 (+/-)	10' by 22'
Booth #3	NA	NA	NA	1989 (+/-)	18' by 30'
Booth #4	NA	NA	NA	1989 (+/-)	18' by 15'
Booth #5	NA	NA	NA	1989 (+/-)	18' by 18'
Booth #6	NA	NA	NA	1989 (+/-)	15' by 51'
Booth #7	NA	NA	NA	1989 (+/-)	15' by 12'
Booth #8	NA	NA	NA	1989 (+/-)	15' by 12'

Control of VOC (and HAP) emissions is ensured through monthly emission calculations, based on quantities of materials and processes used, that include appropriate emission factors for each process conducted in order to document that the facility does not emit more than 99 tons of VOC per rolling 12-month period or 10 tons of VOC in any single month. VOC (and HAP) emissions at Desert Sun are not a result of the presence or use of any specific piece of equipment. Moreover, our application demonstrated the variability of our processes, such that our facility-wide VOC emissions are limited in Permit Condition 18 not more than 10 tons per month and 99 tons per rolling 12-month period, appropriately recognizing that our permit is structured to account for emissions from materials and process, not any specific piece of equipment. Desert Sun does not have any process and equipment in its facility for which individual permits are required.

Except where specifically exempted by the language of a Specific Permit Condition of Desert Sun's air permit, all VOC and HAP emissions will be discharged through one of the listed enclosure booths. Since VOC and HAP emissions from the facility are calculated using approved emission factors for the various process operations conducted that are also based on the quantities of VOC and HAP-containing resin materials used, and since emissions are not dependent on the presence or use of any specific equipment or process that might be employed, then no other equipment at Desert Sun is considered to be significant.

Atomized spray guns have not been included in Desert Sun's listing of equipment as apparently required by Appendix B because of instructions provided verbally during a telephone conversation with Jack Dallal on January 10, 2006, where Desert Sun was advised that several years ago MCAQD made an interim decision not to list spray guns in the equipment list of air permits until development and implementation of policies and procedures governing their use can be finalized. This is consistent with how the existing permit was issued in early 2003. Desert Sun uses hand-held atomized spray guns for some products produced in the Phoenix facility. Any VOC and HAP emissions from these atomized spray guns are, and will be, included in the emissions reported from the listed enclosure booths, calculated using approved emission factors for

the specific atomized spray process operations conducted that are also based on the quantities of VOC and HAP-containing resin materials used.

List of Insignificant Activities and Equipment.

The following list of insignificant activities has been prepared pursuant to Section 308.1a of Rule 200 (08/22/01), "*Rather than supplying detailed information, a Title V source may, in its permit application, list and generally group insignificant activities, which are defined in Rule 100 (General Provisions and Definitions) of these rules and which are listed in Appendix D (List of Insignificant Activities) of these rules*".

Rule 100.258: ***INSIGNIFICANT ACTIVITY –*** *For the purpose of this rule, an insignificant activity shall be any activity, process, or emissions unit that is not subject to a source-specific applicable requirement, that emits no more than 0.5 ton per year of hazardous air pollutants (HAPs) and no more than 2 tons per year of a regulated air pollutant, and that is either included in Appendix D (List of Insignificant Activities) of these rules or is approved as an insignificant activity under Rule 200 of these rules. Source-specific applicable requirements include requirements for which emissions unit-specific information is needed to determine applicability*.

Insignificant activities conducted by Desert Sun Fiberglass include a number of operations that are performed in order to support fabrication and production of standard and custom fiberglass reinforced plastic (FRP) related products, including tanks, automotive products, aerospace products, public transportation products, cultured marble molds and products, custom duct work, architectural products, and other custom FRP-related products that customers may order. Desert Sun Fiberglass is a custom "job shop", and products produced can vary significantly from one time period to another.

The insignificant activities that may be performed at Desert Sun can be generally grouped into one or more of the following categories:

1. Raw Materials Receiving and Storage
    a. Warehousing and Inventory Control
    b. Compliance with HMMP limits (City of Phoenix Fire Department)
2. Resin Formulation and Compounding
    a. Small containers up to 5-gallon capacity, with portable hand-held mixers.
    b. Buckets and drums up 55-gallon capacity, with portable mixers.
    c. Tanks and totes up to 250 gallons with mounted or portable mixer units.
    d. Tanks with capacity up to 12,000 gallons that store liquid with vapor pressure less than 1.5 psia (78 torr). The vapor pressure of styrene at 68 F is 5 torr; the normal boiling point for styrene is 293 F.
    e. In-line resin formulation mixers capable of providing a desired resin mixture continuously through a hose, tube, or pipe line to a specific resin application process.
3. Tooling and Fixtures Preparation
    a. Mold Construction, one-sided; open-mold
    b. Mold Construction, two-sided; close-mold
    c. Resin transfer pumps
    d. Vacuum pumps
4. Resin Application (including MACT Standard WWWW categories)
    a. Manual resin application with nonvapor-suppressed resin.
    b. Manual resin application with vapor-suppressed resin.
    c. Manual resin application with vacuum bagging/closed mold cure with roll-out.

d. Manual resin application with vacuum bagging/closed mold cure without roll-out.
e. Atomized mechanical resin application with nonvapor-suppressed resin.
f. Atomized mechanical resin application with vapor-suppressed resin.
g. Atomized mechanical resin application with vacuum bagging/closed-mold curing with roll-out.
h. Atomized mechanical resin application with vacuum bagging/closed-mold curing without roll-out.
i. Nonatomized mechanical resin application with nonvapor-suppressed resin.
j. Nontomized mechanical resin application with vapor-suppressed resin.
k. Nonatomized mechanical resin application with close-mold curing with roll-out.
l. Nonatomized mechanical resin application with vacuum bagging/close-mold curing without roll-out.
m. Atomized spray gel coat application with nonvapor-suppressed gel coat.
n. Nonatomized spray gel coat application with nonvapor-suppressed gel coat.
o. Manual gel coat application with nonvapor-suppressed gel coat.
p. Resin transfer molding (RTM) with pressurized resin delivery into mold.
q. RTM with vacuum resin delivery into mold.

5. Resin Curing
   a. Open-mold parts, ambient temperature
   b. Close-mold parts, ambient temperature

6. Trimming and Finishing Operations
   a. Hand-held or manually operated equipment used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, or turning of FRP-related products to ensure their finish and final dimensions meet customer requirements and expectations.

7. Packaging for Shipment and Delivery
   a. Preparation of finished products for transportation to customers with sufficient packaging to protect the products so they arrive at customer locations in good condition. Includes possible use of wood, metal, paper and plastic materials. Not all products may require all types of packaging materials.

Desert Sun requests that MCAQD incorporate the above-enclosed equipment list, including the seven categories of insignificant activities, as an addendum to the Technical Support Document for this permit.

Response #18:

MCAQD can not deem a list of general activities to be insignificant for a source without specific information regarding each piece of equipment. In order for an item to be listed as an insignificant activity, more detailed information must be provided by the source in order for a technical evaluation to be made. DSF has informed MCAQD, (March 9, 2005 e-mail) that these ancillary activities are not related to the inclusion of the MACT standard and can be deferred to another time.

DSF has not provided sufficient information to evaluate whether the equipment listed in the comment is insignificant or not, and therefore, MCAQD is unable to address the requested equipment list changes at this time. The requested changes to the equipment list will not be incorporated with this permit revision. As DSF makes changes to their operation and the equipment on site, MCAQD will address these specific situations and equipment changes on a case-by-case basis.

Comments from L & M Laminates

Comment # 1:

Condition 22.A.1, The citation for this condition should be 40 C.F.R. § 63.5790(b).

Response #1:

The citation has been corrected.

Comment # 2:

Condition 22.A.2, The permit does not include all of the operations that are excluded from the NESHAP provision. See 40 C.F.R. § 63.5970(c). The following operations should be included in the list of operations specifically excluded from the requirements of the NESHAP provision.

h) Application of putties, polyputties, and adhesives
i) Polymer casting
j) Closed molding operations (except for compression/injection molding).

Response #2:

The exclusion provisions for the NESHAP have been added to the permit conditions.

Comment # 3:

Condition 22.B.2, the citation for this condition should be to 40 C.F.R. § 63.5860 and 40 C.F.R. 63 Subpart WWWW Table 8.

Response #3:

The citations have been corrected.

Comment #4:

Condition 22.B.3, in paragraph (a), "Tables" should be "Table".

Also, this condition should be revised to clarify that the Permittee need not comply with both paragraph (a) and (b). Under the NESHAP provision, a facility may demonstrate compliance by meeting emissions limits in 40 C.F.R. 63, Subpart WWWW Table 3 or 5 or meeting the organic HAP content limits in 40 C.F.R. 63, Subpart WWWW Table 7. *See* 40 C.F.R. § 63.5810; 63.5835. Table 3 is reproduced in the permit as Table 22.2 while Table 7 is reproduced in the permit as Table 22.4. Table 5 is inapplicable to L & M and is not included. As a result, L & M may demonstrate compliance through meeting the emissions limits in Table 22.2 or the organic HAP content limits in Table 22.4. However, condition 22.B.3 could be read to require L & M to meet both the emissions limits in Table 22.2 and the organic HAP content limits in Table 22.4. L & M proposes rectifying this problem through revising the condition to read:

3) The Permittee shall demonstrate continuous compliance with each standard that applies to the facility using the following methods;

[40 CFR §63.5900][County Rule 370 §303.2]

a) Compliance with organic HAP emissions limits in Table 22.2 or organic HAP content limits in Table 22.4, as applicable, is demonstrated by:
   i) Compliance with organic HAP emissions limits in Table 22.2 is demonstrated by maintaining a organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Tables 22.2 of this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits; or

ii) Compliance with organic HAP content limits in Table 22.4 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 22.4 to this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP content limits.

b) Compliance with the work practice standards in Table 22.3 to this subpart is demonstrated by performing the work practice required for the affected source.

c) The Permittee must report each deviation from each permit condition that is applicable. The deviations must be reported according to the requirements in 40 CFR § 63.5910.

d) The Permittee shall meet the organic HAP emissions limits and work practice standards that are applicable.

Response #4:

Permit condition 22. B. 3) has been changed to reflect the comment. The new condition reads as follows;

3) The Permittee shall demonstrate continuous compliance with each standard that applies to the facility using the following methods;

[40 CFR §63.5900][County Rule 370 §303.2]

a) Compliance with organic HAP emissions limits in Table 22.2 or organic HAP content limits in Table 22.4, as applicable, is demonstrated by:

(1) Compliance with the organic HAP emissions limits in Table 22.2 is demonstrated by maintaining an organic HAP emission factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 22.2 of this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits: or

(2) Compliance with the organic HAP emissions limits in Table 22.4 is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 22.4 of this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP emissions limits

b) Compliance with the work practice standards in Table 22.3 to these permit conditions is demonstrated by performing the work practice required for the affected source.

c) The Permittee must report each deviation from each permit condition that is applicable. The deviations must be reported according to the requirements in 40 CFR § 63.5910.

d) The Permittee shall meet the organic HAP emissions limits and work practice standards that are applicable.

Comment #5:

Condition 22.C.1, Condition 22.C.1 reiterates that L & M must meet the emissions limits outlined in Table 22.2. However, as discussed in the comments to condition 22.B.3, L & M has the option to demonstrate compliance by meeting the organic HAP content limits outlined in Table 22.4. 40 C.F.R. § 63.5835. While at this time L & M will demonstrate compliance through meeting the emissions limits in Table 22.2, this condition should be revised to clarify that L & M could meet the organic HAP content limits in Table 22.4.

1) The Permittee shall meet the annual average organic HAP emissions limits in Table 22.2 or the organic HAP content limits in Table 22.4, as applicable.

Response #5:

Permit condition 22.C.1 has been changed to reflect the comment.

Comment #6:

Condition 22.E, On August 25, 2005 EPA published a direct final rule that revised the compliance options for open molding in 40 C.F.R. Part 63, Subpart WWWW. 70 Fed. Reg. 50,118 (Aug. 25, 2005). These revisions were effective on October 24, 2005. Id. Although the regulations have gone into effect, they have not been incorporated into the printed version of the C.F.R. Permit condition 22.E was based upon the compliance regulations no longer in effect. As a result, condition E must be revised to reflect the currently applicable regulations. L & M proposes that this condition be revised to read:

E. OPTIONS FOR MEETING STANDARDS

Permittee shall use one of the following methods in paragraphs 1) through 4) of this condition to meet the standards for open molding operations in Table 22.2 of this permit. Permittee may use different compliance options for the different operations listed in Table 22.2 of this permit. The necessary calculations must be completed within 30 days after the end of each month. Permittee may switch between the compliance options in paragraphs 1) through 4) of this condition. When Permittee changes to an option based on a 12-month rolling average, Permittee must base the average on the previous 12 months of data calculated using the compliance option Permittee changes to, unless Permittee was previously using an option that did not require Permittee to maintain records of resin and gel coat use. In this case, Permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

1) DEMONSTRATE THAT AN INDIVIDUAL RESIN OR GEL COAT, AS APPLIED, MEETS THE APPLICABLE EMISSION LIMIT IN TABLE 22.2 OF THIS PERMIT.
[40 C.F.R. § 63.5810(a)][County Rule 370 § 303.2]

a) Permittee shall calculate the actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. Permittee must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 22.1 to this permit for open molding or site-specific organic HAP emissions factors discussed in 40 C.F.R.§63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls. If Permittee is using vapor suppressants to reduce HAP emissions, Permittee must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63.

b) If the calculated emission factor is less than or equal to the appropriate emission limit, Permittee has demonstrated that this process stream complies with the emission limit in Table 22.2 to this permit. It is not necessary that all Permittee's process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat Permittee uses, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs 2) through 4) of this condition, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

2) DEMONSTRATE THAT, ON AVERAGE, PERMITTEE MEETS THE INDIVIDUAL ORGANIC HAP EMISSIONS LIMITS FOR EACH COMBINATION OF OPERATION TYPE AND RESIN APPLICATION METHOD OR GEL COAT TYPE.
[40 C.F.R. § 63.5810(b)][County Rule 370 § 303.2]

Demonstrate that on average Permittee meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 22.2 to this permit that applies to Permittee.

a)(i) Group the process streams described in paragraph (1) to this condition by operation type and resin application method or gel coat type listed in Table 22.2 to this permit and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (1)(a) of this condition and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 22.1 of this condition.

Equation 22.1:

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^{n}\text{Material}_i}$$

Where:

Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i, lbs/ton;

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;

n = number of process streams where you calculated an organic HAP emissions factor.

(ii) Permittee may, but is not required to, include process streams where Permittee has demonstrated compliance as described in paragraph (1) of this condition, subject to the limitations described in paragraph (1)(b) of this condition, and Permittee is not required to and should not include process streams for which Permittee will demonstrate compliance using the procedures in paragraph (4) of this condition.

(b) Compare each organic HAP emissions factor calculated in paragraph (2)(a) of this condition with its corresponding organic HAP emissions limit in Table 22.2 to this permit. If all emissions factors are equal to or less than their corresponding emission limits, then Permittee is in compliance.

3) DEMONSTRATE COMPLIANCE WITH A WEIGHTED AVERAGE EMISSION LIMIT.
[40 C.F.R. § 63.5810(c)][County Rule 370 § 303.2]

Demonstrate each month that Permittee meets each weighted average of the organic HAP emissions limits in Table 22.2 to this permit that applies to it. When using this option, Permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all its open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all its centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

a) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for Permittee's facility for the last 12-month period to determine the organic HAP emissions limit Permittee must meet. To do this, multiply the individual organic HAP emissions limits in Table 22.2 to this permit for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in Equation 22.2 of this section.

Equation 22.2:

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n} (EL_i * \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i}$$

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton from Table 22.2 to this permit;

Material_i = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n = number of operations.

b) Each month calculate Permittee's weighted average organic HAP emissions factor for open molding. To do this, multiply Permittee's actual open molding operation organic HAP emissions factors calculated in paragraph (2)(a) of this condition and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 22.3 of this section.

Equation 22.3:

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n} (\text{Actual Operation EF}_i * \text{Material}_i)}{\sum_{i=1}^{n} Material_i}$$

Where:

Actual Individual EF_i = Actual organic HAP emissions factor for operation type i, lbs/ton;

Material_i = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n = number of operations.

c) Compare the values calculated in paragraphs (3)(a) and (b) of this condition. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then Permittee is in compliance.

4) MEET THE ORGANIC HAP EMISSIONS LIMIT FOR ONE APPLICATION METHOD AND USE THE SAME RESIN(S) FOR ALL APPLICATION METHODS OF THAT RESIN TYPE.
[40 C.F.R. § 63.5810(d)][County Rule 370 § 303.2]

This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

a) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, Permittee may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (4)(a). Table 22.4 to this permit presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 22.4 to this permit, the resin is in compliance.

b) Permittee may also use a weighted average organic HAP content for each application method described in paragraph (4)(a) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 1 in paragraph (2)(a) of this condition except substitute organic HAP content for organic HAP emissions factor. Permittee is in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 22.4 to this permit.

c) Permittee may simultaneously use the averaging provisions in paragraph (2) or (3) of this condition to demonstrate compliance for any operations and/or resins Permittee does not include in its compliance demonstrations in paragraphs (4)(a) and (b) of this condition. However, any resins for which Permittee claims compliance under the option in paragraphs (4)(a) and (b) of this section may not be included in any of the averaging calculations described in paragraph (2) or (3) of this condition.

d) Permittee does not have to keep records of resin use for any of the individual resins where Permittee demonstrates compliance under the option in paragraph (4)(a) of this condition unless permittee elects to include that resin in the averaging calculations described in paragraph (4)(b) of this condition.

Response #6:

Permit condition 22.E has been changed to reflect the final version of subpart WWWW.

Comment #7:

Condition 22.F.2, The citation for condition 22.F.2(d) should be 40 C.F.R. § 63.5920(c). The citation for condition 22.F.2(e) should be 40 C.F.R. § 63.5920(d).

Response #7:

The citations have been corrected.

Comment #8:

Condition 22.G.1, An affected facility under 40 C.F.R. 63 Subpart WWWW demonstrating compliance through organic HAP emission limits other than averaging must provide its Notification of Compliance status no later than 30 calendar days after the compliance date. 40 C.F.R. § 63.5905(a); 40 C.F.R. 63 Subpart WWWW, Table 13. However, the date 30 calendar days from L & M's compliance date, May 21, 2006, falls on a Sunday. As a result, L & M must submit the Notification of Compliance by May 22, 2006. Consequently, L & M proposes that the date

"May 22, 2006" replace "April 21, 2006" in the first sentence of this condition. In addition, the citation for this condition should be changed to 40 C.F.R. § 63.5905.

Response #8:

MCAQD does not have the authority to extend a deadline required by a NESHAP requirement. The timing of the notification submittal is clearly defined by the permit conditions and must submitted no later than 30 days after the facility's compliance date. The notification of compliance must be postmarked on or before the day the compliance notification is due. The previous permit condition requiring the compliance notification of April 21, 2006 has been removed. Condition **22.G.2)b)** and **c)** replace this requirement outlining the reporting timeline.

> *b) If the Permittee using the organic HAP emissions limit averaging option to comply with the standard, the notification of compliance status requirements must be submitted no later than 1 year plus 30 days after the facility's compliance date.*
>
> *[40 CFR §63.5905(a)][County Rule 370 §303.2*
>
> *c) If the Permittee is complying by using the organic HAP content limits, application equipment requirements, or the organic HAP emissions limits other than the organic HAP emissions limit averaging to comply with the standard, the notification of compliance requirements must be submitted no later than 30 days after the facility's compliance date.*
>
> *[40 CFR §63.5905(a)][County Rule 370 §303.2*

Comment #9:

There was an incomplete sentence added as condition (e). This should be removed.

Response #9:

This sentence has been removed.

Comment #10:

Also, L & M has replaced all but one of the open mixers with two autocasters. The autocasters mix the resins and thus fall under the regulatory definition of "mixing." *See* 40 C.F.R. § 63.5935. As a result, there are two additional work practice standards in Table 9 to 40 C.F.R. 63 Part WWWW that are applicable to L & M. *See* 70 Fed. Reg. at 50,136. These should be added to this condition as (d) and (e). Specifically, the Department should add conditions (d) and (e) to read:

> (d) That all mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.
>
> (e) That the mixers are closed except when adding materials to the mixing vessels.

Response #10:

The suggested condition language has been added into the permit.

Comment #10:

Condition 22.G.2, this condition outlines an existing facility's requirement to provide an initial notification pursuant to 40 C.F.R. § 63.9(b)(2) and 40 C.F.R. § 63.5905(a). L & M provided its initial notification on October 24, 2003. As a result, this condition is no longer relevant and may create confusion. Including it in the permit implies that L & M needs to provide another initial notification. As a result, L & M proposes striking this condition from the permit.

Response #10:

This is a necessary requirement of subpart WWWW. MCAQD has been notified and assumes that the Administrator (USEPA) has been notified as required.

Comment #11:

Condition 22.G.3, condition (a) should include a citation to 40 C.F.R. § 63.9(h). In conditions (b) and (c), "facilities" should be replaced with "facility's".

Response #11:

The suggested citation and spelling corrections have been added into the permit.

Comment #12:

Condition 22.G.4, L & M proposes that condition (a) specify that the initial semi-annual compliance report shall cover the period ending December 31, "2006". Also, the beginning date of the compliance period should be revised to read "April 21, 2006".

Likewise, condition (b) should specify that the initial semi-annual compliance report must be postmarked or delivered no later than January 31, "2007".

Response #12:

The dates have been changes so that the year has been specified.

Comment #13:

Table 22.1, table 22.1 in the permit corresponds to Table 1 of 40 C.F.R. 63, Subpart WWWW. However, the version of Table 1 in the permit was copied from the regulations prior to the direct final rule that corrected some typographical errors and made other minor corrections. *See* 70 Fed. Reg. at 50,121. L & M proposes that the Department replace Table 22.1 in the permit with the corrected Table 1 of 40 C.F.R. 63, Subpart WWWW. A complete version of this revised table is available at 70 Fed. Reg. at 50,130-31.

Table 22.2, table 22.2 in the permit corresponds to Table 3 of 40 C.F.R. 63, Subpart WWWW. This table also underwent revision as part of the direct final rule. *See* 70 Fed. Reg. at 50,121. L & M proposes that the Department replace Table 22.2 in the permit with the applicable sections of Table 3 from 40 C.F.R. 63, Subpart WWWW. Importantly, L & M does not use mechanical resin application at this time. L & M proposes that the Department adopt the corrected Table 3 available at 70 Fed. Reg. 50,132. Alternatively, the Department could instead include all the "open molding" operations from Table 3 of the revised regulations and insert a table 22.2 that would be as follows:

Operation	Use	Organic HAP Emission Limit[1]
Open Molding: corrosion resistant and/or high strength (CR/HS)	Mechanical resin application	113 lb/ton
	Filament application	171 lb/ton
	Manual resin application	123 lb/ton
Open Molding: non-CR/HS	Mechanical resin application	88 lb/ton
	Filament application	188 lb/ton
	Manual resin application	87 lb/ton
Open Molding: Tooling	Mechanical resin application	254 lb/ton
	Manual resin application	157 lb/ton

Open Molding: Low-flame spread/low-smoke products	Mechanical resin application	497 lb/ton
	Filament application	270 lb/ton
	Manual resin application	238 lb/ton
Open Molding: Shrinkage controlled resins[2]	Mechanical resin application	354 lb/ton
	Filament application	215 lb/ton
	Manual resin application	180 lb/ton
Open Molding: Gel Coat[3]	Tooling gel coating	440 lb/ton
	White/off white gel coating	267 lb/ton
	All other pigmented gel coating	377 lb/ton
	CR/HS or high performance gel coating	605 lb/ton
	Fire retardant gel coating	854 lb/ton
	Clear production gel coating	522 lb/ton

1. Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.
2. This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.
3. If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

Table 22.4, Table 22.4 in the permit corresponds to Table 4 of 40 C.F.R. 63, Subpart WWWW. However, it appears this version of Table 4 was copied from the regulations prior to the direct final rule that corrected some typographical errors and made other minor corrections. *See* 70 Fed. Reg. at 50,121. L & M proposes that the Department replace Table 22.4 in the permit with the corrected Table 4 of 40 C.F.R. 63, Subpart WWWW. A complete version of this revised table is available at 70 Fed. Reg. at 50,133.

Response #13:

The tables have been corrected to reflect the tables in subpart WWWW specified in the final rule.